

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN

2014 APR 25 PM 2:02

CLERK US DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY

DEPUTY

Charlene Emanuel  
Pro Se Plaintiff,

vs.

Bastrop Independent School District

Defendant

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CIVIL ACTION NO. 1:12-CV-00592-  
DAE

JURY DEMANDED

**Pro Se Plaintiff's Motion For Continuance and Extension of Court Deadlines**

To The Honorable David A. Ezra, United States District Court for the Western District of Texas,  
Austin:

Comes now Ms. Charlene Emanuel, acting Pro Se, and pursuant to applicable Federal Rules of Civil Procedure, files this her Pro Se Motion For Continuance and Extension of Court Deadlines, and in support thereof, would show unto this Court the following:

I.

On July 6, 2012, this matter was filed with this court, with summons issued on August 8, 2012.

On December 28, 2012, Plaintiff filed an Amended Complaint through then counsel, Terry Davis, and defendant timely answered.

On May 31, 2013, the court entered its Scheduling Order, setting Discovery Deadline for December 5, 2013, ADR Report deadline for February 28, 2014, and Final Pre-Trial Conference for June 26, 2014.

On July 12, 2013, counsel for Plaintiff filed a Motion to Withdraw from Plaintiff's case, and the court granted said motion on August 5, 2013.

On March 7, 2014, Plaintiff filed her Notice of Grievance with the court advising of her complaint against then represented counsel, Terry Davis and Chris Tolbert.

Since the filing of that grievance, Plaintiff has been without counsel to effectively represent her in these proceedings, and has proceeded in this cause Pro Se. Defendant is aware of Plaintiff's current Pro Se status.

As this matter is set on this court's docket for Final Pre-trial conference on June 26, 2014, Plaintiff needs additional time to seek counsel for representation.

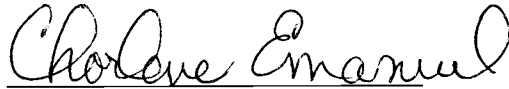
Plaintiff has sought new counsel to prosecute this matter in her behalf. However, as of the filing of this motion, she has been unable to find new counsel for want of adequate resources. She is continuing in her search, however, additional time is needed. Therefore, she is requesting a continuance of the court's scheduling deadlines for at least ninety (90) days to continue search to obtain new counsel, and afford such counsel sufficient time to prepare.

It is hoped that the potential impact on the granting of this motion would not be significant on this Court. Additionally, Defendant should likewise not be prejudiced by the granting of this motion.

This motion is not made for delay, but rather, in the interest of justice.

**WHEREFORE PREMISES CONSIDERED**, Plaintiff prays that this Honorable Court will grant this motion thereby continuing the court's scheduling deadlines of at least ninety (90) days to continue search to obtain new counsel, and afford such counsel sufficient time to prepare.


RESPECTFULLY SUBMITTED,

A handwritten signature in cursive script, reading "Charlene Emanuel".

Charlene Emanuel  
P. O. Box 150941  
Austin, TX 78715  
512/934-0159  
chewky@msn.com  
Pro Se Plaintiff

**Certificate of Conference**

I hereby certify that on April 25, 2014, I attempted to speak with Thomas Phillip Brandt and John D. Husted, opposing lawyers on this matter via telephone, but was unsuccessful. I left a voice message with Thomas Phillip Brandt. Therefore, out of the abundance of caution with time constraints, this motion is being filed.

A handwritten signature in cursive script, reading "Charlene Emanuel".

Charlene Emanuel  
Pro Se Plaintiff

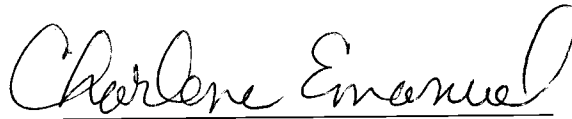
**Certificate of Service**

It is hereby certified that on April 25, 2014, a true and correct copy of the foregoing document, Motion For Continuance and Extension of Court Deadlines, was served on counsel as listed below via US Post, certified mail:

Thomas Phillip Brandt  
Fanning, Harper, Martinson,  
Brandt & Kutchin, P.C.  
Two Energy Square  
4849 Greenville Ave  
Suite 1300  
Dallas, TX 75206  
(214) 369-1300  
Fax: (214) 987-9649

and

John D. Husted  
Fanning, Harper, Martinson,  
Brandt & Kutchin, P.C.  
Two Energy Square  
4849 Greenville Ave  
Suite 1300  
Dallas, TX 75206  
(214) 369-1300  
Fax: (214) 987-9649

A handwritten signature in cursive script, reading "Charlene Emanuel", written in black ink. The signature is fluid and stylized, with a large loop at the end of the last name.

Charlene Emanuel  
Pro Se Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN**

**Charlene Emanuel**  
**Pro Se Plaintiff,**

**vs.**

**Bastrop Independent School District**

**Defendant**

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**CIVIL ACTION NO. 1:12-CV-00592-  
DAE**

**JURY DEMANDED**

**Order On**

**Pro Se Plaintiff's Motion For Continuance and Extension of Court Deadlines**

On \_\_\_\_\_, this Honorable Court considered Pro Se Plaintiff's Motion For Continuance and Extension of Court Deadlines. And, after due consideration, this Court finds that this motion has merit. Therefore, said motion is hereby: **GRANTED.**

**IT IS THEREFORE ORDERED THAT** Plaintiff shall have ninety (90) days from the signing of this order to obtain new counsel, and for counsel's preparation in this matter.

The Final Pretrial Conference is rescheduled to September 26, 2014.

SIGNED, this \_\_\_\_\_ day of \_\_\_\_\_, 2014.

\_\_\_\_\_  
The Honorable David A. Ezra, United  
States District Court for the Western  
District of Texas, Austin